## **BEFORE**

## THE PUBIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NOS. 2015-203-E, 2015-204-E, & 2015-205-E

In re: Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable Net Metering	SUPPLEMENT TO
Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1	PETITION TO INTERVENE OF THE S.C. SOLAR BUSINSS ALLIANCE )
Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates-Net Metering for Renewable Energy Facilities	) ) ) )

Pursuant to Order Number 2015-551 of the South Carolina Public Service Commission ("Commission") the South Carolina Solar Business Alliance, LLC ("SCSBA") hereby timely files this SUPPLEMENT to its previously filed and granted Petition to Intervene in the above-captioned proceedings. As directed by the Commission and in supplement to the showings contained in its Petition, SCSBA further shows the following:

- 1) SCSBA does not oppose Commission approval of the tariffs proposed in these dockets;
- SCSBA is not requesting a hearing in these dockets;
- 3) SCSBA sought to participate in these dockets in order to maintain a consistent presence in all matters related to the implementation of the South Carolina legislature's Act 236 of 2014 ("the Act");
- 4) SCSBA plans to similarly petition for permission to intervene in future proceedings related to the Act, particularly those related to updating of the tariffs proposed in these dockets;
- 5) SCSCBA appreciates the efforts of each applicant to accurately value as many components as possible of the eleven component Net Energy Metering Methodology ("Methodology") approved in Docket 2014-246-E;
- 6) SCSBA agrees with the applicants that values for every single component of the Methodology are unable to be determined at this time;

- 7) However, in regard to all dockets, the SCSBA respectfully asks the applicants to identify the value placed on each component of the Net Energy Metering Methodology for which a value has been assigned;
- 8) SCSBA believes that the interests of ratepayers and the public at large are best served by component-specific transparency into the aggregate figures proposed;
- 9) In regard to Docket 2015-203-E, Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable Net Metering, and Docket 2015-204-E, Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1, SCSBA concurs in the comments offered by the Office of Regulatory Staff that a customer generator's generating system size should be determined using only an AC rating.
- In regard to Docket 2015-205-E, Application of South Carolina Electric & Gas Company for Approval of Rider to Retail Rates Net Metering for Renewable Facilities, the SCSBA respectfully asks that the applicant, in the future and not as a condition to tariff approval, evaluate the operational feasibility of "zeroing out the customer generator's account of excess energy" (as referenced in Paragraph 4, Page 1 of applicant's proposed Rider to Retail Rates Net Energy Metering for Renewable Energy Facilities) in March of each year rather than November;
- 11) The SCSBA believes that a March "zeroing out" is more beneficial to consumers, allowing excess energy generated in summer and fall months to actually offset energy consumed in winter months; and
- 12) Finally, in regard to all dockets, SCSBA concurs in comments filed by the Office of Regulatory Staff related to the non-precedential effect of Commission approval of the proposed tariffs and related to all parties' non-waiver of rights in future proceedings.

WHEREFORE, Petitioner submits this supplement to its' Petitions to Intervene in dockets 2015-203-E, 2015, 204-E, and 2015-205-E.

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August 5, 2015 Columbia, South Carolina

## BEFORE

## THE PUBIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NOS. 2015-203-E, 2015-204-E, & 2015-205-E

In re: Application of Duke Energy Carolinas, LLC for Approval of Rider RNM, Renewable )	
Net Metering )	CERTIFICATE OF SERVICE
Application of Duke Energy Progress, Incorporated for Approval of Renewable Net Metering Rider, RNM-1 )	
Application of South Carolina Electric & ) Gas Company for Approval of Rider to )	
Retail Rates-Net Metering for Renewable	
Energy Facilities )	

This is to certify that I, Bonnie Loomis, have this date served an electronic copy of the SUPPLEMENT TO Petition to Intervene of the South Carolina Solar Business Alliance in the above-referenced matters to all representatives of record for each docket in the South Carolina Public Service Commission Docket Management System ("DMS") and have also caused a printed copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown in the DMS.

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August 5, 2015 Columbia, South Carolina